

TAGLaw International Lawyers

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CLAIM FOR UNLAWFUL TAX (s.74.35, Wis. Stats.)

TO: Clerk, City of Wauwatosa
7725 West North Avenue
Wauwatosa, Wisconsin 53213

Received by

JAN 30 2025

City Clerk's Office

Now comes Froedtert Thedacare Health, Inc. f/k/a Froedtert Health, Inc. ("Claimant")¹, owner of real property Tax Key No. 409-0059-002 located at 10000 West Bluemound Road, Wauwatosa, Wisconsin (the "Property"), by Claimant's attorneys, von Briesen & Roper, s.c., and files this Claim for Unlawful Tax against the City of Wauwatosa ("City") pursuant to Wis. Stat. sec 74.35.

1. Claimant is the owner of the Property, which is located at 10000 West Bluemound Road in the City.
2. For 2024, property in the City was assessed at 68.71% of its fair market value as of January 1, 2024 and was taxed at \$22,519,022 per \$1,000 of assessed value.
3. The 2024 assessment of the Property was set by the City Assessor at \$15,446,500.
4. On, February 29, 2024, the Claimant filed a Property Tax Exemption Request (PR-230) with the City, which was denied, at least in part.
5. Based on the 2024 assessment as set by the City, the City imposed a net tax of \$347,783.26 on the Property.
6. The value of the Property for 2024 is \$7,741,800 because it is partially exempt as a nonprofit hospital pursuant to sec. 70.11(4m)(a), Wis. Stats. The assessment of the property based on 68.71% of its fair market value is \$5,319,400.
7. The maximum 2024 property tax on the Property is \$119,787.69.
8. As a result of the unlawful assessment of the Property for 2024, unlawful tax in at least the amount of \$227,995.57 was imposed on the Property.

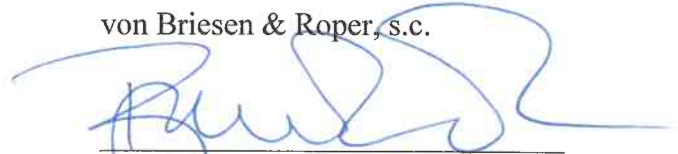
¹ On December 27, 2024, Froedtert Thedacare Health, Inc. transferred the Property to Froedtert Memorial Lutheran Hospital, Inc.

9. On December 27, 2024, Claimant paid the full amount of 2024 taxes on the Property in the amount of \$347,783.26.

10. Wherefore, Claimant requests that the Common Council cancel the unlawful 2024 tax assessment on the Property, and because of the unlawful tax imposed and paid on the Property for 2024, Claimant requests refund of said unlawful tax of \$227,995.57.

Dated at Milwaukee, Wisconsin, this 30th day of January, 2025.

von Briesen & Roper, s.c.

A handwritten signature in blue ink, appearing to be 'Alan Marcovitz', written over a horizontal line.

Alan Marcovitz
Barry R. White
Steven L. Nelson
Katie L. Bireley